

1 ARAVIND SWAMINATHAN (*admitted pro hac vice*)
aswaminathan@orrick.com
2 MICHELLE VISSER (STATAE BAR NO. 277509)
mvisser@orrick.com
3 REBECCA HARLOW (STATE BAR NO. 281931)
rharlow@orrick.com
4 THOMAS FU (STATE BAR NO. 325209)
tfu@orrick.com
5 ORRICK, HERRINGTON & SUTCLIFFE LLP
The Orrick Building
6 405 Howard Street
San Francisco, CA 94105-2669
7 Telephone: +1 415 773 5700
Facsimile: +1 415 773 5759
8

Attorneys for Defendants
9 BLOCK, INC. and CASH APP INVESTING, LLC

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 MICHELLE SALINAS and RAYMEL
14 WASHINGTON, individually and on behalf of
all others similarly situated,

15 Plaintiffs,

16 v.

17 BLOCK, INC. and CASH
18 APP INVESTING, LLC,

19 Defendants.
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Case No. 3:22-cv-04823-AMO

**STIPULATION PURSUANT TO CIVIL
L.R. 6-1(B) TO MODIFY CASE
SCHEDULE**

Judge: Hon. Araceli Martinez-Olguín

Pursuant to Local Rule 6-1(b), Plaintiffs Michelle Salinas and Raymel Washington and Defendants Block, Inc. and Cash App Investing, LLC, by and through the undersigned counsel, hereby stipulate and agree to the following proposed modification of the case schedule:

WHEREAS, the Complaint (ECF No. 1) was filed on August 23, 2022;

WHEREAS, a complaint was filed in an action captioned *Gordon v. Block Inc. and Cash App Investing, LLC*, No. 22-cv-6787 (N.D. Cal.) on November 2, 2022;

WHEREAS, the parties previously stipulated, and the Court approved, that the time for Defendants to answer or otherwise respond to the Complaint be extended to February 3, 2023 (ECF Nos. 22, 25, 33, 34, 39, 40);

WHEREAS, on December 6, 2022, the Court ordered that this matter and *Gordon* be related;

WHEREAS, on December 15, 2022, Defendants filed a motion to consolidate the *Salinas* and *Gordon* actions that is opposed by Plaintiff Gordon;

WHEREAS, the parties previously stipulated to continue the hearing on Defendants' motion to consolidate to the second Thursday after the parties engaged in mediation (ECF No. 50);

WHEREAS, the parties previously stipulated that if the Court grants Defendants' motion to consolidate, then the deadline for Defendants to answer or otherwise respond be continued to 30 days after the filing of a consolidated complaint (ECF No. 50);

WHEREAS, the parties previously stipulated that if the Court denies Defendant's motion to consolidate, then the deadline for Defendants to answer or otherwise respond to the Complaint be continued to 30 days after the Court's denial of the motion (ECF No. 50);

WHEREAS, the Court vacated the hearing on Defendants' motion to consolidate and set a case management conference for May 11, 2023 at 1:30 p.m. by a Zoom videoconference with updated case management conference statements due by May 4, 2023 (ECF No. 51);

WHEREAS, the parties engaged in mediation in an attempt to reach an early resolution of this action on April 24, 2023;

WHEREAS, on May 1, 2023, to facilitate continuing discussions concerning the possibility of early resolution, the Parties stipulated, and the Court approved, that the Case Management

1 Conference previously scheduled for May 11, 2023, be continued to July 13, 2023, and that the
2 action would otherwise be stayed through the completion of the Case Management Conference
3 (ECF Nos. 54 and 55);

4 WHEREAS, pursuant to this Court's Order Reassigning Case (ECF No. 57), this case was
5 reassigned to the Honorable Araceli Martinez-Olguin in the San Francisco Division for all further
6 proceedings; all then-existing deadlines were vacated; and the Parties were required to file a Joint
7 Case Management Statement on or before May 31, 2023;

8 WHEREAS, on May 31, 2023, the Parties jointly filed a Stipulation Pursuant to Civil L.R.
9 6-1(B) (ECF No. 36), stipulating the following: (i) the Joint Case Management Statement would be
10 due on July 6, 2023; (ii) the Case Management Conference previously vacated would be
11 rescheduled by the Court to July 13, 2023, at 10:00 a.m. via Zoom video conference; and (iii) the
12 action would be otherwise stayed through the completion of the Case Management Conference;

13 WHEREAS, on June 2, 2023, the Court ordered the Parties to submit a Joint Case
14 Management Statement on July 6, 2023 and otherwise stayed the action (ECF No. 60);

15 WHEREAS, on June 29, 2023, the Parties jointly filed a Stipulation Pursuant to Civil L.R.
16 6-1(B) (ECF No. 61), stipulating the following: (i) the Joint Case Management Statement would be
17 due September 15, 2023; and (ii) the action would be otherwise stayed. The Stipulation also
18 informed the Court that the Parties had scheduled a second mediation to take place on August 28,
19 2023. The Court entered an Order on August 2, 2023 (ECF No. 62), which stated: (i) the Joint Case
20 Management Statement previously due on July 6, 2023, was not due until September 15, 2023; (ii)
21 the action was otherwise stayed; and (iii) the motion to consolidate, ECF No. 48, was denied
22 without prejudice to refiling once the stay was lifted;

23 WHEREAS, on September 15, 2023, the Parties jointly filed a Stipulation pursuant to Civil
24 L.R. 6-1(B) (ECF No. 64), stipulating the following: (i) the Joint Case Management Statement
25 would be due October 31, 2023; and (ii) the action would otherwise be stayed. The Stipulation also
26 informed the Court that the Parties had re-scheduled mediation for October 18, 2023. The Court
27 entered an Order on September 18, 2023 (ECF No. 65), which stated: (i) the Joint Case Management
28 Statement shall be due on October 31, 2023; and (ii) the action is otherwise stayed.

WHEREAS, the Parties' conducted mediation on October 18, 2023 and thereafter scheduled an additional mediation session on November 17, 2023 for the purposes of continuing discussions regarding the possibility of settlement;

WHEREAS, the parties conducted the continued mediation on November 17, 2023 and made significant progress in their efforts, such that they continue to communicate independently and through the mediator with regard to settlement discussions;

WHEREAS, in light of the prospects of settlement, the Parties believe the *Salinas* action should continue to be stayed;

NOW, Plaintiff and Defendants hereby stipulate that:

- The Joint Case Management Statement shall be due on **January 12, 2024**.
- The action is otherwise stayed.

This is the eighth extension sought by the parties to this litigation and is sought because the parties are attempting to resolve this dispute.

IT IS SO STIPULATED.

Dated: December 12, 2023

By: /s/ Michelle Visser
 Michelle Visser
 ORRICK, HERRINGTON & SUTCLIFFE LLP
 Attorneys for Defendants
 Block Inc. and Cash App Investing LLC

By: /s/ David Goodwin
 David Goodwin
 GUSTAFSON GLUEK PLLC

By: /s/ Scott D. Hirsch
 Scott D. Hirsch
 SCOTT HIRSCH LAW GROUP, PLLC

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By: /s/ Gary S. Graifman
Gary S. Graifman
KANTROWITZ GOLDHAMER & GRAIFMAN, P.C.

By: /s/ Nicholas Migliaccio
Nicholas Migliaccio
MIGLIACCIO & RATHOD LLP

Attorneys for Plaintiff

Attestation re Electronic Signatures

I, Michelle Visser, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's contents and have authorized this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 12, 2023

By: /s/ Michelle Visser
MICHELLE VISSER